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DOC #:  
DATE FILED: 8/23/2022

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

MTHREE CORPORATE  
CONSULTING LIMITED D/B/A  
WILEY EDGE,

Plaintiff,

v.

CHRISTOPHER WASCAK and ROBERT  
ROLLE,

Defendants.

Civil Action No.

1:22-cv-7158

~~PROPOSED~~ ORDER TO SHOW  
CAUSE WITH TEMPORARY  
RESTRAINTS

**THIS MATTER** being opened to the Court by Greenberg Traurig, LLP, attorneys for Plaintiff MThree Corporate Consulting Ltd. (“MThree”), now doing business as Wiley Edge (“Wiley Edge” or the “Company”), upon notice to the Defendants Christopher Wascak and Robert Rolle (“Defendants”), and the Court having considered the Verified Complaint, the supporting Affidavit of Thomas Seymour, the Brief submitted herewith and the arguments of counsel, and the Court having reviewed all of the papers, if any, submitted by the parties; and the Court having afforded the parties the opportunity to be heard; and for good cause shown;

IT IS ON THIS 23<sup>d</sup> day of August, 2022

**ORDERED** that pending the return date of this Order to Show Cause and the Court’s determination of Plaintiff’s request for a preliminary injunction, defendants Christopher Wascak and Robert Rolle are hereby immediately enjoined and restrained from:

- (a) Violating, or participating in the violation of, any of the terms of the February 25, 2019 Employment Offer Letter and Confidentiality, Restrictive Covenant and Inventions Agreement executed by Mr. Wascak (the “Wascak Agreement”), the January 8, 2020

Employment Offer Letter and Confidentiality, Restrictive Covenant and Inventions Agreement executed by Mr. Rolle (the "Rolle Agreement"), or the September 2020 and December 2021 Restricted Share Unit Grant Agreements executed by Mr. Wascak (the "RSU Grant Awards");

(b) Continuing to form, launch, operate, or provide services to HTD Talent or any Competing Business of the Company in violation of the Wascak Agreement, Rolle Agreement or RSU Grant Awards; and

(c) Disclosing any trade secrets or confidential and proprietary information of the Company to any third party, including HTD Talent.

**IT IS FURTHER ORDERED** that defendants Christopher Wascak and Robert Rolle shall show cause before this Court at the United States Courthouse, 500 Pearl Street, New York, NY 10007, <sup>Courtroom 14D</sup> on the 6<sup>th</sup> day of September 2022, at 10:00 a.m./p.m., why an Order should not be entered for the following relief:

- (1) Preliminarily enjoining defendants from violating, or participating in the violation of, any of the terms of the Wascak Agreement, Rolle Agreement, or RSU Grant Awards during the pendency of this litigation or until further order of the Court;
- (2) Preliminarily enjoining defendants, for a period of at least twelve (12) months from the date of the issuance of the injunction order, from engaging in any Interfering Activities (as defined in the Wascak and Rolle Agreements) during the pendency of this litigation or until further order of the Court;
- (3) Preliminarily enjoining defendants from continuing to disclose, transfer or convey any Confidential Information (as defined in the Wascak and Rolle Agreements) to any third party, including HTD Talent, in violation of the Wascak and Rolle Agreements during the

pendency of this litigation or until further order of the Court;

- (4) Preliminarily enjoining defendants, for a period of at least six (6) months from the date of the issuance of the injunction order, from engaging in activities which are competitive with the business of the Company or otherwise Competing with the Company (as defined in the Wascak and Rolle Agreements) during the pendency of this litigation or until further order of the Court.


**IT IS FURTHER ORDERED** that defendants shall file and serve any opposition papers to the Order to Show Cause by August 30, 2022; and

**IT IS FURTHER ORDERED** that defendants shall file and serve an Answer to the Verified Complaint within the time period prescribed by the Rules of Court. In the event the Defendants shall fail to timely file and serve an Answer, a judgment by default may be rendered against Defendants for the relief demanded in the Verified Complaint; and

**IT IS FURTHER ORDERED** that Plaintiff shall file and serve any reply papers to Defendants' opposition by September 2, 2022;

**IT IS FURTHER ORDERED** that a copy of this order to Show Cause be served upon Defendants within 2 days of the date hereof either personally or via overnight courier service. (5)

IT IS FURTHER ORDERED, that Following the appearance of Defendants, the parties write a joint letter to the Court to confirm their availability for the hearing date scheduled herein.

  
Gregory H. DeGard, U.S.D.J.  
Part E